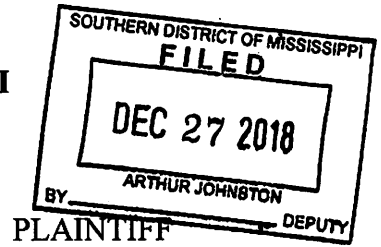


**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**



DOUGLAS HANDSHOE

PLAINTIFF

VS.

CIVIL ACTION NO. 1:15cv382HSO-JCG

VAUGHN PERRET, CHARLES LEARY &
DANIEL ABEL, D/B/A TROUT
POINT LODGE LTD OF NOVA SCOTIA
& IN THEIR INDIVIDUAL CAPACITIES
PROGRESS MEDIA GROUP LIMITED,
MARILYN SMULDERS, TORSTAR
CORPORATION, NATIONAL
GEOGRAPHIC SOCIETY, XYZ
FOUNDATION & JOHN DOES 1-50

DEFENDANTS

**COUNTERCLAIMANT CHARLES LEARY'S
REBUTTAL TO MR. HANDSHOE'S OPPOSITION (ECF 306) TO A
MOTION FOR ADDITIONAL DISCOVERY**

Mr. Handshoe fails to indicate any prejudice he will suffer should he have to submit to discovery requests after he has filed his defense.

He also intentionally misrepresents to the Court that Leary has never provided him with any discovery, including prominently a copyright transfer agreement. This is patently false, as is shown by Mr. Handshoe's own filings in Stone County Circuit Court and records of PDF files provided to Mr. Handshoe by Leary (cf. Leary declaration dated December 20, 2018, and exhibits).

Mr. Handshoe also fails to controvert the case law cited by Dr. Leary regarding the propriety of discovery after the close of pleadings and before any summary judgment motions.

For the above reasons and those already argued, Dr. Leary again respectfully requests the capacity to

conduct additional discovery, which may include a telephonic deposition.

RESPECTFULLY SUBMITTED, this the 20 day of DECEMBER, 2018.

A handwritten signature in blue ink, appearing to read 'CL' or 'Charles Leary', is written above the printed name.

CHARLES LEARY, DEFENDANT

appearing *pro se*

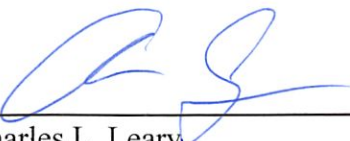
308 5th Ave E
Vancouver, BC V5T 1H4
Canada

802-440-0213
foodvacation@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that, on Dec 20, 2018, I caused a true and correct copy of the above and foregoing to be filed utilizing the Court's CM/ECF electronic document filing system, which caused notice of such filing to be delivered to all counsel of record and parties requesting notice, and by United States First Class Mail, postage prepaid, to the following non-ECF participants having appeared in this action:

[none]



Charles L. Leary